

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

ORAL HILLARY,

Plaint

vs.

ST. LAWRENCE COUNTY, ST. LAWRENCE
COUNTY DISTRICT ATTORNEY'S OFFICE, ST.
LAWRENCE COUNTY DISTRICT ATTORNEY
MARY E. RAIN, Individually and in her Official
Capacity, UNIDENTIFIED JANE/JOHN DOE #1-10
ST. LAWRENCE COUNTY EMPLOYEES,
UNIDENTIFIED JANE/JOHN DOE #11-20 ST.
LAWRENCE COUNTY DISTRICT ATTORNEY
EMPLOYEES, ST. LAWRENCE COUNTY SHERIFF
KEVIN M. WELLS, Individually and in his Official
Capacity, ST. LAWRENCE COUNTY DEPUTY
SHERIFF JOHN E. JONES, JR., Individually and in his
Official Capacity, UNIDENTIFIED JANE/JOHN DOE
#21-30 ST. LAWRENCE COUNTY SHERIFF
EMPLOYEES,

VILLAGE OF POTSDAM, VILLAGE OF POTSDAM
POLICE DEPARTMENT, VILLAGE OF POTSDAM
FORMER CHIEF OF POLICE EDWARD TISCHLER,
Individually and in his Official Capacity, VILLAGE OF
POTSDAM FORMER CHIEF OF POLICE KEVIN M.
BATES, VILLAGE OF POTSDAM FORMER
POLICE LIEUTENANT (presently Acting Chief of
Police) MARK MURRAY, Individually and in his
Official Capacity, UNIDENTIFIED JANE/JOHN DOE
VILLAGE OF POTSDAM EMPLOYEES #31-40,

ONONDAGA COUNTY, ONONDAGA DISTRICT
ATTORNEY WILLIAM FITZPATRICK,

NEW YORK STATE POLICE, NEW YORK STATE
POLICE OFFICER GARY SNELL, Individually and in
his Official Capacity, NEW YORK STATE POLICE
INVESTIGATOR THEODORE LEVINSON, NEW
YORK STATE POLICE INVESTIGATOR TIM
PEETS, RAY WICKENHEISER, individually and in
his Official Capacity as Director, Crime Lab System,
New York State Police Forensic Investigation Center,
JULIE PIZZIKETTI, individually and in her Official
Capacity as Director of Biological Science, New York
State Police Forensic Investigation Center,
UNIDENTIFIED JANE/JOHN DOE #41-50 NEW
YORK STATE POLICE EMPLOYEES,

Defendar

DECLARATION

Civil Action No.:
8:17-CV-00659 (GLS/DEP)

CHRISTINA M. VERONE JULIANO, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I am attorney admitted to practice law in the State of New York and am a partner at the law firm of Hancock Estabrook, LLP. As such, I am fully familiar with the facts and circumstances set forth below.

2. I submit this Declaration in support of Defendants St. Lawrence County, St. Lawrence County District Attorney's Office, Unidentified Jane/John Doe #1-10 St. Lawrence County Employees, Unidentified Jane/John Doe #11-20 St. Lawrence County District Attorney Employees, St. Lawrence County Sheriff Kevin M. Wells, Individually and in his Official Capacity, and Unidentified Jane/John Doe #21-30 St. Lawrence County Sheriff Employees' Motion to Dismiss, seeking dismissal of Plaintiff's Complaint in its entirety, pursuant to FED. R. CIV. P. §12(c).

3. Plaintiff's Complaint is attached as **Exhibit "1"**.

I swear under penalties of perjury that the foregoing is true and correct.

Dated: November 13, 2017

/s/ Christina M. Verone Juliano
Christina M. Verone Juliano